

### **REMARKS:**

This application has been reviewed in light of the Office Action mailed January 20, 2011. Reconsideration of this application in view of the below remarks is respectfully requested. By the present amendment, claim 1 is amended. No new subject matter is introduced into the disclosure by way of the present amendment. Claims 1-11 are pending in the application with claim 1 being in independent form.

#### **Specification**

The specification is objected to as failing to provide proper antecedent basis for the claimed subject matter. It is stated that the delineation of fifth and sixth rows and columns (as in Claim 1) does not have antecedent basis in the Specification. Applicant submits that the Specification provides proper antecedent basis for the terms. For example, the fifth and the sixth rows and columns are shown in Figures 5 and 6. In detail, the upper figure of Figure 5 shows positions of I/O cells (CELL-A and CELL-B), and the lower figure of Figure 5 shows positions in pads in each I/O cell (CELL-A and CELL-B). In the lower figure of Figure 5, pad is arranged in 3/3 matrix. Figure 6 shows the same layout of pads of CELL-A and CELL-B. Therefore, the meaning of the terms used in claim 1 is apparent from the descriptive portion of the specification. Applicant respectfully requests withdrawal of this objection.

#### **Rejection under 35 U.S.C. §112, second paragraph**

Claims 1-11 are rejected under 35 U.S.C.112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. It is stated that claim 1 recites “a first row, a second row, a third row, a first column, a second column and a third column” in lines 9-10 and then goes on to recite “a first row, a first column” line 16; “a second row” line 17; “a second column” lines 17-

18; “a fourth row, a fourth column” line 20; “a fifth row” line 21; “a fifth column” line 22, however, it is unclear if the second recitations of a first row, a second row, a second column, a fourth row, a fourth column, a fifth row, a fifth column were intended to refer to the same rows and columns previously claimed. Claim 1 is amended to clarify the recitation. Therefore, Applicant respectfully requests withdrawal of this rejection.

**Rejection under 35 U.S.C. 102(e)**

Claims 1-2 and 4-11 are rejected under 35 U.S.C.102(e) as being anticipated by U.S. 6,111,756 to Moresco.

The Examiner stated that the terms “first row”, “first column”, “second row”, “second column”, etc., do not provide significant definition of the structure of the claimed invention and accordingly will be interpreted broadly. Applicant submits that these phrases provide at least the number of the row/column and provide important definition of the structure.

Also, in response to Applicant argument, the Examiner asserts that Moresco can be interpreted to show both a first group of I/O cells and a second group of I/O cells including all the pertinent rows and columns as claimed.

Claim 1 is amended to further distinguish from Moresco to recite “the first column and the first row are each arranged parallel to a side of the mounting member so as to surround a center of the mounting member, the second column and the second row are each arranged parallel to the side of the mounting member so as to surround the center of the mounting member, the third column and the third row are each arranged parallel to the side of the mounting member so as to surround the center of the mounting member, the fourth column and the fourth row are each arranged parallel to the side of the mounting member so as to surround the center of the mounting member, the fifth column and the fifth row are each arranged parallel to the side of

the mounting member so as to surround the center of the mounting member and the sixth column and sixth row are each arranged parallel to the side of the mounting member so as to surround the center of the mounting member.” Support for the amendment can be found at Figures 5 and 6. Even if Moresco teaches the feature that the Examiner stated, the additional feature of claim 1 is not taught by Moresco.

Therefore, claim 1 and its dependent claims are patentable over Moresco. Applicant respectfully requests withdrawal of the rejection.

**Rejection under 35 U.S.C. 103(a)**

Claim 3 is rejected under 35 U.S.C. 103(a) as being unpatentable over Moresco and further in view of Applicant’s Admitted Prior Art of Figure 1 (hereinafter “AAPA”). Figure 1 of AAPA does not teach the feature discussed above, as recited in claim 1. Claim 3 depends on claim 1 and, therefore, is patentable for at least the same reason as claim 1. Applicant respectfully requests withdrawal of the rejection.

### CONCLUSION

In view of the foregoing amendments and remarks, it is respectfully submitted that all claims presently pending in the application, namely, claims 1-11, are believed to be in condition for allowance and patentably distinguishable over the art of record.

If the Examiner should have any questions concerning this communication or feels that an interview would be helpful, the Examiner is requested to call Applicant's undersigned attorney at the number indicated below.

Respectfully submitted,

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